

**COUNTY OF SANTA BARBARA
PUBLIC WORKS DEPARTMENT**

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SUBJECT: Comments on DWR's IRWM Process Improvement

Dear Mr. Wallace,

The Santa Barbara IRWM Region was constituted in 2005 and we prepared and adopted our first IRWM Plan in 2007. Our region benefitted through Propositions 50 and 84, and our region has been active in its support of IRWM efforts and programs. The Santa Barbara region is grateful to DWR staff for their on-going communication and interest in obtaining and integrating feedback on the IRWM program. The Santa Barbara Region thanks you and DWR for the opportunity to comment on IRWM Grant Program Delivery. The following constitute our comments.

1. In DWR's Grant Program Guidelines, page 12, Table 1 lists the Statewide Priorities of the Program. Chief among these priorities is Drought Preparedness and desirable proposals will achieve one or more of the following:
 - *Promote water conservation, conjunctive use, reuse and recycling;*
 - *Improve landscape and agricultural irrigation efficiencies;*
 - *Achieve long term reduction of water use;*
 - *Efficient groundwater basin management;*
 - *Establish system inerties.*

AA /EEO Employer

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Specifically, the Santa Barbara Region would like to address the priority of *Improve landscape and agricultural irrigation efficiencies*, which is of particular importance in our region.

Agriculture is both the largest industry and the largest water user in the region. As such, improving agricultural efficiency is extremely important to the ability of the Santa Barbara region to remain hydrologically independent, regionally self-reliant, and effective in managing our groundwater basin as well as sustaining other local water supplies in both drought and non-drought conditions.

The region obtains upwards of 75% of its water resources from groundwater and surface water and is therefore, not as dependent on State Water Project water and the majority of the State, which is of great benefit to the Bay-Delta and in conformance with the aims of the Department of Department of Water Resources. The difficulty we have with the priority, *Improve landscape and agricultural irrigation efficiencies*, is that all agriculture occurs on private property and while there is an overwhelming public benefit to the health and sustainability of our groundwater basin to optimize agricultural water use efficiency, we are unclear of DWR's position on improvements on private property. In that agriculture is one of the largest industries in the California, produces 60% of the and collectively uses 80% of the state's water resources, the ability of the IRWM program to meet a stated priority and significantly positively impact water resources requires DWR to include flexible language, flexible interpretation and sufficient latitude of project types for water efficiency infrastructure improvements on private lands, particularly in cases of agricultural water use efficiency. The guidelines, criteria and scoring of these projects must unequivocally recognize the public benefits of investment into agricultural irrigation infrastructure on privately owned agricultural lands that will enable the regions and the State to recover hundreds of thousands of AFY of water for the health and benefit of groundwater basins, surface waters and ecosystems.

2. The State of California is large and representative of a number of different climates, ecosystems and water circumstances. Each IRWM region is also unique in their local water situation, needs and goals. In addition, each IRWM regions, while striving to and meeting Statewide aims must also be responsive to their own regional needs. Therefore, we recommend that the evaluation and scoring of project also take into account each regions' unique and articulated, priorities and goals.
3. Often, disadvantaged communities lack the staff, technical expertise and significant amount of background documentation required to be included in the IRWM application process. DWR should require either commensurately fewer requirements for DAC communities or fund more planning and feasibility study types of projects through Implementation Grant applications to allow for DACs to be more competitive and support DAC participation in the IRWM program.

4. The Benefit/Cost ratio analysis required for projects is biased in favor of large, infrastructure laden projects and is not an effective tool for the evaluation of water efficiency projects, ecosystem restoration projects and other less intensive infrastructures projects that have the same or similar priorities and outcomes. DWR must develop an evaluation tool that sufficiently and fairly evaluates such projects that DWR has indicated are priorities.

We are happy to discuss the contents and comments in this letter and I can be reached at 805.568.3041 or via email at: BStewart@cosbpw.net. Again, thank you for the opportunity to comment on DWR's IRWM Process Improvement.

Sincerely,



Bret A. Stewart, P.E.
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